

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR  
Reina Jordan-Sodig Plaintiff(s),  
v.  
Social Security et. al., and Defendant(s).  
Houston County Community Hospital Defendant  
Response to Defendant Houston County Hospital  
(Type of Pleading)  
Motion to Dismiss

① Exhibit A: Standard of Operating Procedures  
for laboratory work shift Plaintiff was preparing  
example pages 1 -

② Exhibit B: Copy of My/Plaintiff Medical  
Technologist License Tennessee and American  
Medical Technologist Certification both  
current and in good standing

①

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)  
has been served on:

(Name)

I.J. Scott Sims DISMISS

(Address)

3102 West End Avenue, Suite 1100

(Address)

Nashville TN 37203

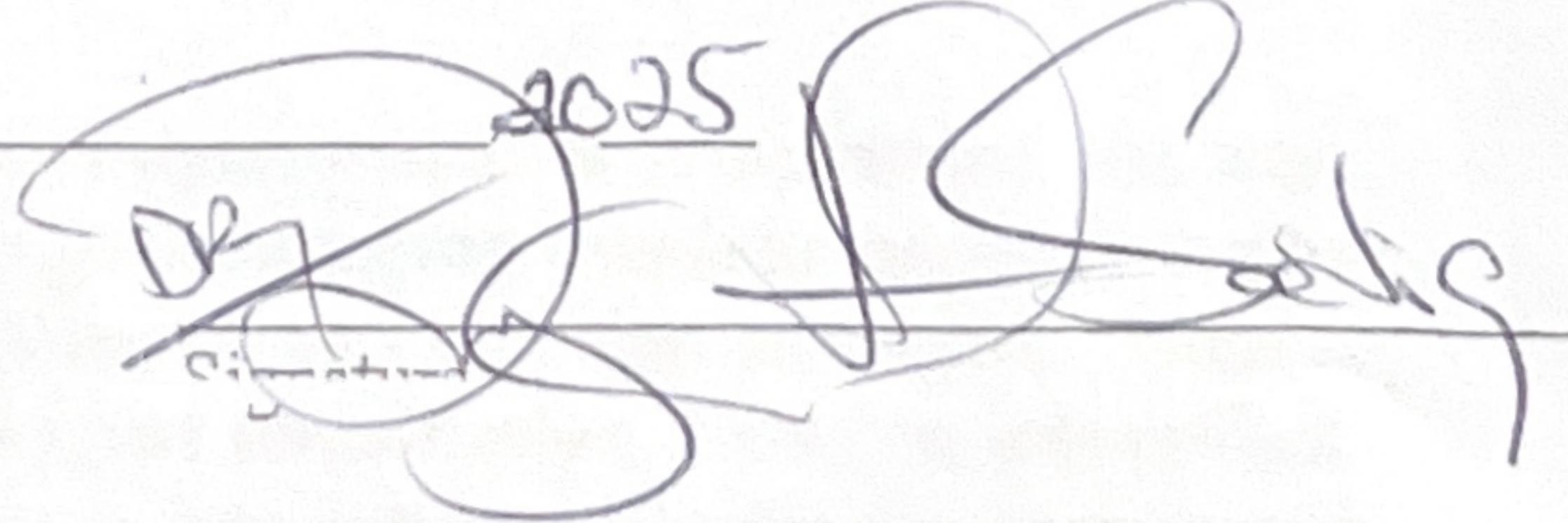
(Name)

(Address)

(Address)

on the 4<sup>th</sup> day of May

2025



(3)

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
TENNESSEE

Dr. Regina Jordan-Sodiq, ) Case No.: 3:25-CV-00288  
Plaintiff ) Judge Eli Richardson Jury Demand  
v. )  
Social Security et.al., Defendant )  
Houston County Community Hospital )  
Defendant. )

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
DISMISS AND MOTION TO COMPEL DISCLOSURE OF HEARING DATE AND  
REGISTERED AGENT INFORMATION**

**I. INTRODUCTION**

COMES NOW Plaintiff, Dr. Regina Jordan-Sodiq, respectfully opposing Defendants' **Motion to Dismiss**, and further moves this **Honorable Court** to compel Defendant **Houston County Community Hospital (HCCH)** to:

1. Disclose the scheduled hearing date and location for Defendant's pending **Motion to Dismiss**.
2. Provide the correct registered agent name and full address for proper service of process.
3. Deny Defendants' **Motion to Dismiss with prejudice**, as the Plaintiff has provided substantial factual allegations and legal claims warranting litigation.

**II. FACTUAL BACKGROUND**

Plaintiff was employed by Defendant Houston County Community Hospital as a licensed **Medical Technologist**, holding **advanced certification and responsibilities exceeding those of her Caucasian coworkers, who were Medical Technicians**. Plaintiff was entrusted with preparing for independent 12-hour night shifts, demonstrating her commitment to professional excellence.

Despite Plaintiff's dedication, qualifications, and demonstrated competence, she was subjected to discriminatory treatment, including disparaging remarks questioning her credentials and competence, motivated by bias based on race, age, and rank. These prejudicial remarks were compounded by an unjust termination, based on unverified accusations from biased coworkers, rather than an impartial performance assessment.

#### 4. Retaliation and Unlawful Bias

- o Defendants failed to uphold procedural fairness, acting upon prejudicial accusations from biased coworkers to justify Plaintiff's wrongful termination.

### VI. EVIDENCE OF COMPETENCE

Plaintiff's SOP binder serves as concrete evidence of her preparedness, diligence, and professional initiative. The binder directly refutes Defendants' allegations of incompetence and demonstrates her commitment to excellence in her role.

Additionally, Plaintiff submits her Letter of Certification, confirming her status as a licensed Medical Technologist, further establishing her qualifications and ability to perform her duties competently.

### VII. RELIEF REQUESTED

**WHEREFORE**, Plaintiff respectfully requests that this Court:

- **Compel Defendants to disclose the hearing date, time, and location** for their pending Motion to Dismiss.
- **Require Defendants to confirm the registered agent's full name and official address**, ensuring proper legal service.
- **Deny Defendants' Motion to Dismiss with prejudice**, as Plaintiff has presented substantial factual allegations and legal claims warranting litigation.
- **Grant leave to amend the Complaint as necessary**, should corrections or further clarifications be required to ensure procedural integrity.
- **Grant any further relief deemed just and equitable** to prevent procedural obstruction and ensure due process.

### CERTIFICATE OF SERVICE

I hereby certify that on this **4th day of May, 2025**, a true and correct copy of Plaintiff's **Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information**, along with accompanying exhibits, was served via **electronic filing** upon the following:

**Defendants' Counsel:** Michael J. Banks C/O Christopher B. Fowler email: [cfowler@kaygriffin.com](mailto:cfowler@kaygriffin.com). Kay Griffin PLLC.

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

*[Handwritten signature]*  
Submitted this 4th day of May, 2025  
**Dr. Regina Jordan-Sodiq, Pro Se Plaintiff**  
1757 Autumnwood Blvd Clarksville, TN 37042

*Civil A*

Plaintiff proactively created a **Standard Operating Procedures (SOP) binder**, evidencing professional diligence and commitment to her role. However, shortly after her probationary period, Defendants wrongfully terminated Plaintiff, failing to provide a legitimate, nondiscriminatory basis for their decision.

### **III. DEFENDANTS' FAILURE TO DISCLOSE HEARING DATE IMPEDES DUE PROCESS**

1. Defendants filed a Motion to Dismiss, yet failed to disclose the scheduled hearing date, time, and location, obstructing Plaintiff's ability to prepare an adequate response.
2. Plaintiff has made multiple attempts to obtain this critical procedural information, but Defendants have refused to provide clarity, impeding procedural fairness.
3. The absence of a disclosed hearing date places Plaintiff at an unjust disadvantage, requiring judicial intervention to compel compliance.
4. Additionally, Defendant **Karen Diane Hargrove**, acting as **Laboratory Supervisor**, played a role in Plaintiff's employment-related claims and should be **recognized in this litigation**.

### **IV. DEFENDANTS' FAILURE TO DISCLOSE REGISTERED AGENT INFORMATION**

5. Defendant Houston County Community Hospital has failed to confirm its correct legal entity name and registered agent, obstructing Plaintiff's ability to serve process in compliance with Tennessee law.
6. Defendant's failure to provide accurate service information necessitates judicial intervention to prevent further procedural obstruction.

### **V. LEGAL CLAIMS**

1. **Violation of the Tennessee Human Rights Act (THRA) (Tenn. Code Ann. § 4-21-101 et seq.)**
  - o Plaintiff was subjected to discrimination based on race, age, and rank, in violation of the **THRA**.
  - o Disparate treatment compared to her Caucasian coworkers, coupled with hostile remarks and wrongful termination, establishes a **prima facie case of discrimination**.
2. **Violation of Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.)**
  - o Plaintiff's termination was **motivated by racial bias and retaliation**, violating federal employment protections.
  - o Defendants' reliance on **unsubstantiated claims and failure to conduct an impartial review** constitutes unlawful discrimination.
3. **Hostile Work Environment**
  - o Plaintiff was subjected to **covert workplace harassment**, including **demeaning comments** about her qualifications and professionalism.
  - o The persistent pattern of discriminatory remarks created an intimidating, oppressive work environment, violating state and federal law.

# Exhibit A

**HEMATOLOGY @ 4am**  
--START UP -----make sure get  
Hematology start -up Binder in cabinet  
F2, Esc  
Diluter Function-----SECONDARY MODE ONLY  
Start-up, 2X  
Esc  
Controls  
Enter, 'control run'  
F2-'Latron QC' (white bottles)—use the bottle  
w/ the blk top for the lot# info-(bottle #2)  
F3, enter  
F4, Primer (white top)  
Esc  
F3, control , F3 (Secondary /blk top)  
F4, print---should have 3-4 pages when  
finished  
  
\*\*Run Hematology controls in PRIMARY ONLY  
Abn I, Normal QC  
  
QC Coulter Latrons in bottom cabinet  
\*IF retic is out of range it is ok, only concerned  
with DIFF MODE

**COAG**  
--get Coag Green Binder  
--go by maintenance instructions  
  
**TEMPERATURE:**  
Sysmex  
Temps, compare w/ book  
  
**RINSE PROBE:**  
Special menu  
Rinse probe  
Setup  
  
\*PTT and CaC1 are stable for 2 days, the  
others are 1 day stable  
\* INNOVIN only dilution that is made up

**HMX MAINTENANCE BINDER**  
--put in papers  
Daily Latron Tab  
Daily Start up Tab  
  
**COAG REAGENTS**  
PTT/ACTIN/ green top bottle --2 days stable  
PT/INNOVIN/orange top bottle—1 day stable  
CA Clean I & II –1 day stable  
CACL –2 day stable  
  
\*make new labels for cleaning agents  
\*\*COAG maintenance binder is in cabinet w/  
Clinitek maintenance binder  
  
Ex: LABELS: INNOVIN  
O: 9-16-17  
E: 9-17-17 0430  
  
**Chemistry**  
  
CHANGE LIGHT SENSOR:  
Home screen  
F4, sys prep  
F3, IMT  
F1, change consumables (Std A, Std B, Flush,  
Salt Soln, Diluent, Sensor)  
F4, Diluent Check  
--Dilution soln is in the fridge  
--also use serum to check the sensor  
--? blue  
  
**COAG**  
  
**POSTING QC**  
After completing Coag QC, input  
QC 1  
QC 2, "not 3 as it is on the bottle"  
-go to red "auto" button on pending list and  
click on COAG "CA-600" and then input results  
and put "P" for 'Post'.  
  
\*\*Don't forget to sign QC log Book on top of  
machine

## **DATA ENTRY INTO COMPUTER**

ABN 1, Normal QC

Hematology start up Binder in cabinet

QC Coulter Latrons , are in bottom cabinet beneath hematology rocker

esc

controls

enter, control run

F2, LATRON , use the bottle with the blk top for LOT# infor (Bottle #2)

F3, enter

F4, primer, white top do first control

F4 , print

esc, F3, control @ (secondary blk top) F3

F4, print, should have 4 papers when finished

\* if retic is out of range it is ok, diff mode is ok,

*Exhibit A-2*

# Exhibit A3

Change Hematology slide box/ file slides in cabinet & pull out and dump slides from previous week

\*\*Hematology Path Reviews are to be copied and one copy placed in Pathologist book for review

Run Start-up on HMX, F2 "Dilution", enter

Perform Daily Maintenance per Binder-Latron Primer, Latron QC—Run in **SECONDARY MODE**

File HMX Start up and Latron printouts in HMX Maintenance Binder— 3--4 pages

0400-0500

Run Hematology QC (Normal & Abnormal I)—primary side only

COAG—Refresh Coag reagents as needed and perform daily maintenance listed in Coag Binder

**SUNDAY ONLY**—clean COAG w/ Reagent Alcohol (located in yellow cabinet in blood bank), then refill DI water

**SUNDAY night AND MONDAY morning**—Run Coag QC, once reconstituted only good for 16 hours, and must be ran every 8 hours

0500

Make sure you've signed off all daily maintenance binders/clipboards and put in QC results into the computer—**HMX,UA,CHEM,COAG** (sun and mon)

Begin Morning Draws and Glucometer sticks

\* Replace sheets at end of month and highlight weekly maintenance in Coag and UA Book

\*wipe counters

refill-stock phlebotomy trays and work stations

# DATA ENTRY INTO COMPUTER

## HOW TO RECEIVE ORDERS

go to pending lists  
high light patient  
modify options  
click on receive /collect specimen orders

Exhibit A4

## HOW TO ORDER TESTS

enter account # ex: #100045----  
order entry laboratory  
choose tests  
collect date/time  
recv date/time  
verify w/ labels

\*if phlebotomy not done here, then put  
"." and tech initials and date/time  
specimen collected

## HOW TO INPUT RESULTS AFTER DOING A TEST

click on order entry  
go to worksheet screen  
ex:      MONO-    lot#  
                      exp date  
            Pos-      Line  
            Neg-      Clear background  
            Pt results

## HOW TO INPUT DIFFERENT RESULTS FROM SAME TEST

ex: Hema--department specific  
click laboratory  
CBC of patient  
"for indication" of diff  
#2, enter  
"enter" diff results  
click enter  
RED cell review  
"normal " or "abnormal"  
#2  
enter results  
Complete

## ANOTHER WAY:

pt # ex: 1004---  
ALL orders  
laboratory  
click on unverifies

# DATA ENTRY INTO COMPUTER

CHEM

F3 load list

then exit

Put QC results in EXL Maintenance Book, read off of slip, the things to put into book are at top that match the CHEM PRINT OUT, just follow the print out and compare to top of page in book

Exhibit A5

TEMP:

the laboratory temperature book has the number of the thermometer to read, and the number is listed on the thermometer too.

INPUT chem QC

\*short limited cups in blk/brwn rack

on computer attached paper

\*MAS QC ( all QC is listed on the computer paper slip w/ # to put into the computer)

\*CARDIAC QC, HGB A1C QC

ex: QC1: 9119071

QC3: 9119073

P9 will get all tests for 'MAS QC'

F1 , enter data

position, ex: N1

sample #, ex: Hgb A1c QC

QC1 9933921

enter, enter

HB!C (alt + HB!C)

F7, mode, limited cup no level sense

F4, priority

F8, Fluid (QC1)

F3, load list

exit

F4, run, (or green button)

(ALT + hot keys)

When QC is out , hit edit run

process single

run

5

Hematology @4am do: Abnormal 1 and Normal

F2, esc

diuter function

start-up ,2x

# DATA ENTRY INTO COMPUTER

Chemistry:  
system prep  
system counter  
change diapers  
save info  
Load film F1  
Tension F2  
Calibrations print out folder is on top of fridge

TUBE RACK:  
regular barcoded tubes in blk /green holders  
short specimen cup in tube : orange/yellow w/ green holder  
QC and Calibrators use short cup curvette:  
blk w/brown holders; just put them in and change computer to QC "limited cup"

*Exhibit A6*

## LOAD AND RUN SAMPLES:

place in blk/green rack  
hit "run" (green button)  
F1, to get to manual input screen  
keep doing "sample status"/F5 until see time tests have left

## LOAD AND RUN QC

manual input 'short sample/limited cup'

## Glucometer

after stick then remember to collect and receive the specimen result before inputting results and completing

## MILIPORE

daily maintenance: press arrow once to 'wake up' then hold down until says "DI", push the check, then the arrow to move through to D1, D2,D3,D4,D5,D6, then push the menu button for the main screen

## BINDERS

Glucometer QC

Temps

Gather all results , slips put in folder

Gather all tubes, put in fridge and dump the 'next day'

Set out urine QC to get room temp/not really necessary

## URINE QC

qc test due

qc strip test

in computer:  
Dept specific  
QC data management reports  
By control  
"UR", then chose UR1 or UR2  
enter, enter, RDJ (all caps)  
put in results  
POST

*Exhibit B*

